

REMARKS

An excess claim fee payment letter is submitted herewith for three (3) additional claims.

Claims 1-6, 8-16, 18, and 20-26 are all the claims presently pending in the application.

Claims 1, 4, 12, and 21 are amended to more clearly define the invention, claims 17 and 19 are canceled, and claims 22-26 are added. Claims 1, 12, and 21 are independent.

These amendments are made only to more particularly point out the invention for the Examiner and not for narrowing the scope of the claims or for any reason related to a statutory requirement for patentability.

Applicants also note that, notwithstanding any claim amendments herein or later during prosecution, Applicants' intent is to encompass equivalents of all claim elements.

Claims 4, 10, and 17 stand rejected under 35 U.S.C. § 112, first paragraph. Claims 1-3, 5, 12-15, and 18-19 stand rejected under 35 U.S.C. § 102(e) as being anticipated by the Nawata, et al. reference. Claims 1-3, 5, 12-14, and 18 stand rejected under 35 U.S.C. § 102(e) as being anticipated by the Notake, et al. reference. Claim 21 stands rejected under 35 U.S.C. § 102(e) as being anticipated by the Nawata, et al. reference. Claim 21 stands rejected under 35 U.S.C. § 102(e) as being anticipated by the Notake, et al. reference. Claims 1-6 and 8-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Kato reference in view of the Notake, et al. reference. Claims 1-6 and 8-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Kato reference in view of the Nawata, et al. reference. Claims 8-9 and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Nawata, et al. reference.

These rejections are respectfully traversed in the following discussion.

I. THE CLAIMED INVENTION

An exemplary embodiment of the claimed invention, as defined by, for example, independent claim 21, is directed to a pedal bracket that includes an outwardly swollen rigidity supplementing portion in the vicinity of the front end portion of the pedal bracket, and a brittle portion that is contiguous to and at a rear side of the rigidity supplementing portion.

As explained by the present specification, a first conventional pedal support structure includes a back plate 140 (e.g., see Figure 6 of the present application) just above a hole in a pedal bracket 110 which improves longitudinal rigidity of the pedal bracket. The hole is provided to allow the bracket to crush easily in the event of a front end collision. However, there is a risk that the back plate 140 will deteriorate the deforming promoting function of the hole in the pedal bracket.

As shown in Fig. 7 (which corresponds to JPA 9-25821 to Kato, cited by the Examiner and discussed below), a second conventional pedal support structure includes pedal bracket 222 which includes an opening which deforms and is rigidly supported at a bracket side sliding portion 238 which must be attached to a vehicle side sliding member 241 at an inclination angle θ . However, the second conventional pedal support structure requires a number of components and further requires extensive modifications to the vehicle side to include a vehicle side sliding member at the inclination angle.

By contrast, the present invention solves the problems of the conventional structures by providing a pedal bracket that includes an outwardly swollen rigidity supplementing portion in the vicinity of the front end portion of the pedal bracket, and a brittle portion that is contiguous to

and at a rear side of the rigidity supplementing portion. In this manner, with only a simple modification, the rigidity of the pedal bracket during operation is assured while ensuring deformation at the brittle portion during impact absorption. (Page 5, line 24 - page 6, line 4).

II. THE 35 U.S.C. § 112, FIRST PARAGRAPH REJECTION

The Examiner alleges that claims 4, 10, and 17 fail to comply with the written description requirement.

With respect to claims 4 and 10, while Applicant submits that such would be clear to one of ordinary skill in the art taking the present Application as a whole, to speed prosecution claim has been amended in accordance with Examiner Kim's very helpful suggestions.

With respect to claim 17, the Office Action alleges that the limitation "wherein said brittle portion comprises a slit" is considered new matter since the structure is not disclosed or shown in either the specification or the drawings as originally filed. Applicants respectfully traverse this rejection.

Contrary to the Examiner's allegation, the specification as originally filed very clearly explains that "Appropriate modifications can be also selected to mode for forming the same (the swelling bead as the brittle portion may be provided as a curved rib or a rigid supplementing plate may be attached thereto, the brittle portion may be constituted by a number of slits or formed into a thin portion)." (Page 12, lines 18 - 23).

Therefore, the specification very clearly discloses that the brittle portion may comprise a slit.

In view of the foregoing, the Examiner is respectfully requested to withdraw these rejections.

II. THE PRIOR ART REJECTIONS

A. The 102(e) Nawata et al. reference

Regarding the rejections of claims 1-3, 5, 12-15, 18-19, and 21, the Examiner alleges that the Nawata et al. reference teaches the claimed invention. Applicants submit, however, that there are elements of the claimed invention which are neither taught nor suggested by the Nawata et al. reference.

Contrary to the Examiner's allegations, the Nawata et al. reference does not teach or suggest the feature of the brittle portion being contiguous to the outwardly swollen rigidity supplementing portion. As explained above and in the specification, the brittle portion being contiguous to the outwardly swollen rigidity supplementing portion assures that deformation occurs at the brittle portion thereby ensuring a controlled deformation during impact absorption.

Additionally, this feature in combination with the rigidity supplementing bracket at the rear of the pedal bracket ensures that deformation for impact absorption occurs at the brittle portion rather than in the vicinity of the pedal pivot supporting portion.

In other words, the brittle portion being contiguous with the outwardly swollen rigidity supplementing portion, deformation at the brittle portion can be assured such that withdrawal of the pedal lever against the driver side is effectively prevented and smooth impact absorption is attained by stable deformation at the brittle portion.

In stark contrast, the Nawata et al. reference does not disclose an outwardly swollen rigidity supplementing portion that is contiguous to a brittle portion. Rather, the Nawata et al. reference appears to disclose a pair of side plates that each include a triangular hole 40. At a front end of the side plates 32 adjacent to the base plate 34, the side plates appear to include a flared portion. The flaring of the flared portion is illustrated by the line that illustrates the edge of the side plate 32 that is adjacent to the base plate 34. That line is straight at the top of the side plate and at the bottom, but includes a portion that is curved in the center, thereby indicating a flared portion.

However, while the forward most edge of the side plates 32 appear to include a flared portion, it is very clear that the flared portion is not contiguous with the triangular hole 40. Rather, the edge lines of the triangular hole 40 are completely straight, thereby illustrating that the side plate 32 is completely flat adjacent to the triangular hole 40. In other words, the flared portion does not extend to (and, therefore, is not contiguous with) the triangular hole 40.

Thus, it is very clear that the flared portion of the side plate is not contiguous with the triangular hole 40.

Therefore, the pedal bracket that is illustrated by the Nawata et al. reference suffers from the same problem that is solved by the present invention. The Nawata et al. reference does not accurately control deformation of the pedal bracket at the triangular hole by ensuring that any rigidity supplementing portion is contiguous to a brittle portion. In other words, the pedal bracket that is disclosed by the Nawata et al. reference cannot guarantee that the portion of the pedal bracket 32 that is adjacent to and forward from the triangular hole 32 will not deform.

Therefore, the Nawata et al. reference does not teach or suggest each and every element of the claimed invention. Thus, the Examiner is respectfully requested to withdraw this rejection of claims 1-3, 5, 12-15, 18-19, and 21.

B. The 102(e) Notake et al. reference

Regarding the rejection of claims 1-3, 5, 12-14, 18, and 21, the Examiner alleges that the Notake et al. reference teaches the claimed invention. Applicants submit, however, that there are elements of the claimed invention which are neither taught nor suggested by the Notake et al. reference.

The Notake et al. reference does not teach or suggest the features of the present invention. Indeed, as explained very clearly in the Amendment that was filed on April 19, 2004, the Notake et al. reference does not teach or suggest an outwardly swollen rigidity supplementing portion which is formed in the front end portion of the bracket.

Rather, as clearly shown by Figures 13 and 21 of the Notake et al. reference the bead 108 is provided above and behind the opening 106.

As explained in detail in the Amendment that was filed on April 19, 2004, the Notake et al. reference very clearly explains that the bracket 100 is designed to deform at opening 106 while simultaneously the rear portion of the bracket 100 at slotted portion 118 slides along the guide rail 116. The guide rail 116 guides the slotted portion 118 of the pedal bracket 100 downward, as shown in Figs. 13 and 14, and to the side, as shown in Figs. 14-15. The purpose of sliding the slotted portion 118 of the bracket 100 downward and to the side is to move the pedal

away from an occupant and to the side as shown in Figs. 14-15. The only reason that the pedal is guided away from an occupant and to the side is because the pedal bracket maintains its structural integrity where the pedal 10 is pivotally connected to the pedal bracket 100. Therefore, the bead 108 is provided to maintain the structural integrity of the pedal bracket where the pedal 10 attaches to the pedal bracket 100.

In other words, the only reason for providing the bead 108 that is disclosed by the Notake et al. reference is to maintain the structural integrity of the pedal bracket at a portion that attaches to the pedal 10 so that the movement of the pedal 10 is accurately controlled while the slotted portion 118 of the pedal bracket 100 slides along the guide rail 116 and while the opening 106 collapses in a frontal impact. Therefore, the Notake et al. reference clearly explains that the bead 108 must be provided behind the opening 106 so that the structural integrity of the pedal bracket to which the pedal 10 is mounted is ensured so that the movement of the pedal is accurately controlled to move down and to the side in a frontal impact.

Further, the Examiner appears confused about the slide bracket 148 that is fixed to the rear end side of the pedal bracket (col. 17, lines 13-14). Clearly, any such additional bracket like the slide bracket 148 can only have an effect of improving the rigidity of the pedal bracket 100. Therefore, contrary to the Examiner's allegation, the slide bracket 148 does not correspond to the brittle portion as recited by the claims.

Lastly, the Notake et al. reference does not teach or suggest the feature of the brittle portion being contiguous to the outwardly swollen rigidity supplementing portion. As explained above and in the specification, the brittle portion being contiguous to the outwardly swollen

rigidity supplementing portion assures that deformation occurs at the brittle portion thereby ensuring a controlled deformation during impact absorption.

Additionally, this feature in combination with the rigidity supplementing bracket at the rear of the pedal bracket ensures that deformation for impact absorption occurs at the brittle portion rather than in the vicinity of the pedal pivot supporting portion.

In other words, the brittle portion being contiguous with the outwardly swollen rigidity supplementing portion, deformation at the brittle portion can be assured such that withdrawal of the pedal lever against the driver side is effectively prevented and smooth impact absorption is attained by stable deformation at the brittle portion.

Therefore, the Notake et al. reference does not teach or suggest each and every element of the claimed invention. Thus, the Examiner is respectfully requested to withdraw this rejection of claims 1-3, 5, 12-14, 18, and 21.

C. The Kato reference in view of the Notake et al. reference

The Examiner alleges that the Notake et al. reference would have been combined with the Kato reference to form the claimed invention. Applicants submit, however, that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention.

Applicants submit that the Examiner can point to no motivation or suggestion in the references to urge the combination as alleged by the Examiner.

The Examiner continues to allege that it would have been obvious to modify the bracket

structure that is disclosed by the Kato et al. reference to include the bead 108 that is disclosed by the Notake et al. reference “in order to provide increased rigidity so that any further deformation caused by collision may be prevented and thus lowering the repairing (sic) cost.”

Firstly, contrary to the Examiner’s allegation, the bead 108 does not lower the repair cost by preventing deformation. Rather, as is clearly shown in Fig. 14 of the Notake et al. reference the bead 108 forms a part of the pedal bracket 100 which is deformed beyond repair at the opening 106. Thus, the fact that the bead 108 resists and/or prevents deformation of a portion of the bracket 100 adjacent to the bead 108, the bead 108 does not prevent the bracket from deforming beyond repair at the opening 106 and, therefore, cannot reduce repair costs.

Secondly, none of the applied references teaches or suggests that a bead 108 has any affect at all upon the cost of repair. Rather, and in stark contrast to the Examiner’s allegations, the Notake et al. reference very clearly explains that the bracket 100 is designed to deform at opening 106 while simultaneously the rear portion of the bracket 100 at slotted portion 118 slides along the guide rail 116. The guide rail 116 guides the slotted portion 118 of the pedal bracket 100 downward, as shown in Figs. 13 and 14, and to the side, as shown in Figs. 14-15. The purpose of sliding the slotted portion 118 of the bracket 100 downward and to the side is to move the pedal away from an occupant and to the side as shown in Figs. 14-15. The only reason that the pedal is guided away from an occupant and to the side is because the pedal bracket maintains its structural integrity where the pedal 10 is pivotally connected to the pedal bracket 100. Therefore, the bead 108 is provided to maintain the structural integrity of the pedal bracket where the pedal 10 attaches to the pedal bracket 100.

In other words, the only reason for providing the bead 108 that is disclosed by the Notake et al. reference is to maintain the structural integrity of the pedal bracket at a portion that attaches to the pedal 10 so that the movement of the pedal 10 is accurately controlled while the slotted portion 118 of the pedal bracket 100 slides along the guide rail 116 and while the opening 106 collapses in a frontal impact.

Therefore, contrary to the Examiner's allegation, not only does the bead 108 have absolutely no effect on the cost of repair, but the Notake et al. reference clearly explains that the bead 108 is provided to accurately control the movement of the pedal in a frontal impact.

Thirdly, the pedal bracket structure that is disclosed by the Kato reference does not teach or suggest a guide rail. Therefore, since the bead 108 is only provided to control the motion of the pedal through the use of a guide rail as disclosed by the Notake et al. reference, there is no motivation to modify the Kato reference to include the bead 108.

Fourthly, the Examiner's proposed modification of providing a bead 108 would not function in the manner that the Examiner has alleged. Rather, the bead 108 that is disclosed by the Notake et al. reference clearly has a longitudinal extent which is greater than the longitudinal extent of the portion of the pedal bracket disclosed by the Kato reference that the Examiner alleges corresponds to the increased rigidity portion. Thus, the bead 108 that is disclosed by the Notake et al. reference could not be positioned at the portion of the pedal bracket disclosed by the Kato reference that the Examiner alleges corresponds to the increased rigidity portion.

Indeed, the only possible manner that the bead 108 that is disclosed by the Notake et al. reference could be incorporated into the portion of the pedal bracket disclosed by the Kato

reference that the Examiner alleges corresponds to the increased rigidity portion would be to position the bead 108 vertically as is shown, for example, in Fig. 8 rather than horizontally as shown in Fig. 13. However, as is clearly explained by the Notake et al. reference a vertically oriented bead 90 does not function to increase rigidity, rather, a vertically oriented bead has a “low rigidity” (col. 11, line 62 - col. 12, line 4). Indeed, the Notake et al. reference clearly explains that a vertically oriented bead is provided to cause the pedal bracket to collapse (col. 12, lines 32 - 52 and Fig. 11).

Therefore, the Examiner’s proposed modification of providing a bead as disclosed by the Notake et al. reference to the forward portion of the pedal bracket that is disclosed by the Kato reference would lower the rigidity rather than increase the rigidity and would clearly not operate in accordance with the Examiner’s allegations.

In the “Response to Arguments” section of the July 7, 2004, Office Action the Examiner responds to the fact that the bead 108 that is disclosed by the Notake et al. reference could not be positioned at the portion of the pedal bracket disclosed by the Kato reference that the Examiner alleges corresponds to the increased rigidity portion by alleging that “the test for obviousness is not whether the features of a secondary reference may be bodily incorporated into the structure of the primary reference; nor is it that the claimed invention must be expressly suggested in any one or all of the references. Rather, the test is what the combined teachings of the references would have suggested to those of ordinary skill in the art.”

Applicants do not disagree with this statement of the test for obviousness. Indeed, Applicants respectfully submit that this test that the Examiner has set forth is exactly the reason

why the Examiner's obviousness rejection fails.

The entire point of the Applicants setting forth how it is not possible to perform the modification that the Examiner alleges one of ordinary skill in the art would have been motivated to perform is that the combined teachings of the references would not have suggested the modification to those of ordinary skill in the art precisely because the modification is not possible.

In other words, one of ordinary skill in the art would not have been motivated to perform a modification that such a person of ordinary skill in the art would have understood was not possible to perform.

Even assuming arguendo that one of ordinary skill in the art would have been motivated to combine these references, the combination would not teach or suggest each and every element of the claimed invention.

As explained previously and as agreed by the Examiner, the Kato reference does not teach or suggest a pedal bracket which includes an outwardly swollen rigidity supplementing portion.

The Examiner alleges that the Notake et al. reference remedies the deficiencies of the Kato reference by disclosing a bead 108 which the Examiner alleges corresponds to the claimed outwardly swollen rigidity supplementing portion.

However, Applicants note that the Examiner did not answer the substance of the Applicants' previous traversal that is found in the April 19, 2004, Amendment. Indeed, the Examiner continues to ignore the language of the claims.

The fact that the Examiner ignores the language of the claims results in a lack of a prima

facie case of obviousness.

If the Examiner continues to reject the claims, Applicants respectfully request:

- 1) that the Examiner refer to the claim language; and
- 2) answer the substance of the material traversed.

In this particular instance, the Examiner has failed to provide a prima facie case of obviousness by failing to provide a reference that teaches or suggests the feature of an outwardly swollen rigidity supplementing portion that is toward the front end portion of the pedal bracket.

Clearly, the Kato reference does not teach or suggest this feature.

The Notake et al. reference does not remedy the deficiencies of the Kato reference. The Notake et al. reference does not teach or suggest an outwardly swollen rigidity supplementing portion which is formed in the front end portion of the bracket.

Rather, as clearly shown by Fig. 13 of the Notake et al. reference the bead 108 is provided above and behind the opening 106. As explained in detail above, the Notake et al. reference clearly explains that the bead 108 must be provided behind the opening 106 so that the structural integrity of the pedal bracket to which the pedal 10 is mounted is ensured so that the movement of the pedal is accurately controlled to move down and to the side in a frontal impact.

Moreover, none of the applied references teaches or suggests the feature of the brittle portion being contiguous to the outwardly swollen rigidity supplementing portion. As explained above and in the specification, the brittle portion being contiguous to the outwardly swollen rigidity supplementing portion assures that deformation occurs at the brittle portion thereby ensuring a controlled deformation during impact absorption.

Additionally, this feature in combination with the rigidity supplementing bracket at the rear of the pedal bracket ensures that deformation for impact absorption occurs at the brittle portion rather than in the vicinity of the pedal pivot supporting portion.

In other words, the brittle portion being contiguous with the outwardly swollen rigidity supplementing portion, deformation at the brittle portion can be assured such that withdrawal of the pedal lever against the driver side is effectively prevented and smooth impact absorption is attained by stable deformation at the brittle portion.

Therefore, the Examiner is respectfully requested to withdraw the rejection of claims 1-6 and 8-20.

D. The Kato reference in view of the Nawata et al. reference

The Examiner alleges that the Nawata et al. reference would have been combined with the Kato reference to form the claimed invention. Applicants submit, however, that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention.

Applicants submit that the Examiner can point to no motivation or suggestion in the references to urge the combination as alleged by the Examiner.

The Examiner alleges that it would have been obvious to “a person of ordinary skill in the art at the time the invention was made to modify the bracket structure of Kato (sic) with the outwardly swollen rigidity supplementing portion as taught by Nawata et al. (sic) in order to provided increased rigidity so that any further unnecessary deformation caused by collision may

be prevented and thus, lowering the repairing cost.”

None of the applied references teaches or suggests any relationship at all between the outwardly swollen rigidity supplementing portion that is disclosed by the Nawata et al. reference and the ability to lower the repair cost.

Indeed, none of the applied references provides any explanation at all for the presence of the outwardly swollen rigidity supplementing portion that is disclosed by the Nawata et al. reference. Therefore, the Examiner is entirely relying upon the Examiner’s own creativity and imagination to manufacture some imaginary purpose for making a modification without any basis in reality.

Moreover, Applicants respectfully submit that one of ordinary skill in the art at the time of the invention would have absolutely no interest in any repair costs. Rather, one of ordinary skill in the art would only be interested in manufacturing cost, the ability to perform the functions of supporting the operation of the pedal, and, above all, protecting the occupants of the vehicle in the event of a collision. One of ordinary skill in the art would have absolutely no interest in lowering the repair cost.

Moreover, even assuming arguendo that one of ordinary skill in the art would have been motivated to combine these references, the combination would not teach or suggest each and every element of the claimed invention.

As explained previously, none of the applied references teaches or suggests the feature of the brittle portion being contiguous to the outwardly swollen rigidity supplementing portion. As explained above and in the specification, the brittle portion being contiguous to the outwardly

swollen rigidity supplementing portion assures that deformation occurs at the brittle portion thereby ensuring a controlled deformation during impact absorption.

Additionally, this feature in combination with the rigidity supplementing bracket at the rear of the pedal bracket ensures that deformation for impact absorption occurs at the brittle portion rather than in the vicinity of the pedal pivot supporting portion.

In other words, the brittle portion being contiguous with the outwardly swollen rigidity supplementing portion, deformation at the brittle portion can be assured such that withdrawal of the pedal lever against the driver side is effectively prevented and smooth impact absorption is attained by stable deformation at the brittle portion.

Therefore, the Examiner is respectfully requested to withdraw the rejection of claims 1-6 and 8-20.

E. The Nawata et al. reference

The Examiner alleges that it would have been obvious to modify the Nawata et al. reference to form the claimed invention.

Applicants submit, however, that one of ordinary skill in the art at the time of the invention would not have been motivated to modify the disclosure of the Nawata et al. reference and further that the Nawata et al. reference does not teach or suggest each and every element of the claimed invention.

The Examiner does not provide a prima facie case of obviousness.

Section 2142 of the MPEP requires:

“To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant’s own disclosure.” (Emphasis added).

In the present instance, the Examiner points out that the Nawata et al. reference discloses a brittle portion which corresponds to the triangular hole 40 and concedes that the Nawata et al. reference fails to disclose a hole that is semi-circular in shape.

In an attempt to remedy this deficiency, the Examiner alleges that “[i]t would have been obvious to modify the triangular shaped hole of Nawata et al. (sic) with a semi-circular shaped hole, since applicant has not disclosed the criticality of the semi-circular shaped hole has on the brittle portion and it appears that the brittle portion would perform equally well with the hole with any reasonable shape.” (Emphasis added).

First, with regard to the Examiner’s allegation that Applicant has not disclosed the criticality of the semi-circular shape, Applicants respectfully submit that any such criticality is irrelevant to whether the Examiner has provided a *prima facie* case of obviousness. The burden is not on the Applicants to prove the criticality of any shape. Rather, the burden is upon the

Examiner to provide a prima facie case of obviousness, which the Examiner clearly has not done.

Second, the Examiner's obviousness rejection ignores the requirement that "the prior art reference (or references when combined) must teach or suggest all of the claim limitations"

(M.P.E.P. § 2142). Indeed, the Examiner concedes that the applied reference does not disclose all of the claim limitations.

However, the Examiner appears to directly violate the requirement that the applied reference must disclose all of the claim limitations by relying upon the Applicants' own disclosure for a teaching in an effort to use the Applicants' own teachings against the Applicants' own claims.

This is a clear instance of impermissible hindsight construction.

Further, as explained above, the Nawata et al. reference does not teach or suggest the feature of the brittle portion being contiguous to the outwardly swollen rigidity supplementing portion. As explained above and in the specification, the brittle portion being contiguous to the outwardly swollen rigidity supplementing portion assures that deformation occurs at the brittle portion thereby ensuring a controlled deformation during impact absorption.

Additionally, this feature in combination with the rigidity supplementing bracket at the rear of the pedal bracket ensures that deformation for impact absorption occurs at the brittle portion rather than in the vicinity of the pedal pivot supporting portion.

In other words, the brittle portion being contiguous with the outwardly swollen rigidity supplementing portion, deformation at the brittle portion can be assured such that withdrawal of the pedal lever against the driver side is effectively prevented and smooth impact absorption is

attained by stable deformation at the brittle portion.

Therefore, the Examiner is respectfully requested to withdraw the rejection of claims 8-9 and 16.

III. FORMAL MATTERS AND CONCLUSION

The Office Action objects to the drawings. This Amendment amends claim 4 and cancels claim 17. Applicants respectfully request withdrawal of this objection.

In view of the foregoing amendments and remarks, Applicant respectfully submits that claims 1-6, 8-16, 18, and 20-26, all the claims presently pending in the Application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the Application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

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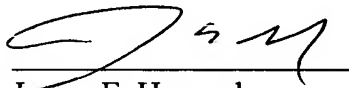
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The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

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